

*SC NAACP v. Alexander,*  
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

# Exhibit I

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF SOUTH CAROLINA  
3 COLUMBIA DIVISION  
4

5 THE SOUTH CAROLINA STATE CONFERENCE OF THE NAACP,  
6 et al.,

7 Plaintiffs,

8 vs. CASE NO.: 3:21-CV-03302-MGL-TJH-RMG

9 THOMAS C. ALEXANDER, et al.,

10 Defendants.  
11

12 DEPOSITION OF: SENATOR LUKE A. RANKIN  
13 (APPEARING VIA VIRTUAL ZOOM)

14 DATE: August 2, 2022

15 TIME: 10:52 AM

16 LOCATION OF  
17 THE DEPONENT: Rankin & Rankin Law Firm  
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Conway, SC

18 TAKEN BY: Counsel for the Plaintiffs  
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21  
22  
23  
24  
25

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(INDEX AT REAR OF TRANSCRIPT)

1 SENATOR LUKE A. RANKIN

2 being first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. TRIVEDI:

5 Q. Good morning, Mr. Rankin. Nice to see  
6 you again.

7 A. Good morning.

8 Q. My name is Somil Trivedi. As you know,  
9 I represent the plaintiffs in this suit. Even  
10 though you just did for the court reporter, could  
11 you please state your full name for the record,  
12 spelling your last name.

13 A. Luke Rankin. L-U-K-E, R-A-N-K-I-N.

14 Q. Great. For today's deposition, I just  
15 want to start with some basic ground rules, which  
16 you probably are already familiar with, but just so  
17 that we're on the same page. You understand that  
18 you're testifying under oath today, is that right?

19 A. Yes, sir.

20 Q. Is there any reason you aren't able to  
21 truthfully answer my questions today?

22 A. No.

23 Q. Are you on any medication or anything  
24 else that might inhibit your capacities or anything  
25 like that?

1 by. That's my only goal, so let's continue on.

2 Q. Okay.

3 MR. TRIVEDI: And, John, I'm just  
4 asking you, do you agree I've got to reserve my  
5 rights that if Senator Rankin absolutely has to go,  
6 then we'll hold this open for the remainder of the  
7 time that I need that I hope won't be the entire  
8 time allowed?

9 MR. GORE: Well, I don't know that we  
10 need an agreement on that because I don't think  
11 Senator Rankin said that he has to go at a  
12 particular time. I think he's expressed that he'd  
13 like to be done at five o'clock and I think we'd  
14 all like to be done as expeditiously as possible.  
15 So I don't think we need an agreement and we  
16 certainly don't have one at this point because I  
17 don't know what the rest of the question is going  
18 to be.

19 And I don't think you'd be entitled to  
20 restart the deposition, which is what I think you  
21 said before, whether there might be an entitlement  
22 to resume it subject to existing time limits.  
23 That's something we can discuss if and when we get  
24 to that point.

25 MR. TRIVEDI: Okay. Great.

1 BY MR. TRIVEDI:

2 Q. So, Senator Rankin, I have put an  
3 exhibit that I have marked as Exhibit 1 into  
4 Exhibit Share.

5 (EXHIBIT 1, 2021 Redistricting  
6 Guidelines, was marked for identification.)

7 BY MR. TRIVEDI:

8 Q. Are you able to see that?

9 A. Not from this screen, no. You got to  
10 hit share screen or do I?

11 MR. TRIVEDI: It's not really a share  
12 screen situation, but if you have Exhibit Share  
13 through Veritext open, you ought to be able to just  
14 see it.

15 Can we go off the record for a moment,  
16 Madam Court Reporter?

17 COURT REPORTER: Yes.

18 (Off-the-record conference.)

19 BY MR. TRIVEDI:

20 Q. Senator, I'm showing you what I've  
21 marked as Exhibit 1. Do you see that?

22 A. I do.

23 Q. Have you seen this document before?

24 A. I have.

25 Q. What is it?

1           A.     That's the guidelines that we adopted  
2     September 17th.

3           Q.     Okay. And these are the guidelines  
4     governing redistricting?

5           A.     Correct.

6           Q.     Okay. I'm just going to call these the  
7     guidelines going forward if that's okay.

8           A.     All right.

9           Q.     So were you involved in creating these?

10          A.     No.

11          Q.     Who was?

12          A.     Charlie and Andy, based -- and these  
13     were very similar to what we had done in South  
14     Carolina every ten years.

15          Q.     Okay. Did you have any input in what  
16     should and shouldn't be a guideline?

17          A.     Well, we voted on these, so, yeah.

18          Q.     Okay. But did you have any input on  
19     the draft that was considered by the committee?

20          A.     No. No.

21          Q.     That was just Andy and Will?

22          A.     No, Andy and Charlie.

23          Q.     Oh, I'm sorry about that. Andy and  
24     Charlie.

25          A.     I assume. Again, those would be



1 questions to ask those two gentlemen.

2 Q. Okay. Do you know if Andy and Charlie  
3 consulted with any outside lawyers?

4 A. Do not.

5 Q. Okay. Do you know if Andy and Charlie  
6 conducted any legal research before they submitted  
7 this to the committee?

8 A. Do not.

9 Q. Did you ever ask them to to make sure  
10 that you were getting the law right in here?

11 A. Directly, probably not. Again, Paula's  
12 been involved in redistricting before. They  
13 attended CL -- not CLE's, but seminars on these  
14 across the country. Charlie again has been either  
15 a litigant or representing some party, at least  
16 three of these, if not four, which may be -- seem  
17 odd, but it's maybe because he's perhaps around my  
18 age and so maybe -- but, anyway, he's familiar with  
19 this.

20 Q. Okay. Do you know the parties that  
21 Charlie's represented in redistricting litigation  
22 by any chance?

23 A. The Senate the last time, I believe.

24 Q. Okay. He's never represented  
25 plaintiffs in a redistricting case?

1 A. Not to my knowledge.

2 Q. Okay. You just mentioned Paula. So  
3 was Paula also involved in creating these  
4 guidelines for your review in committee?

5 A. She would have been consulted with Andy  
6 and Paula and Charlie, I'm sure.

7 Q. Okay. Did the guidelines include input  
8 from members of the public?

9 A. To the degree that we discussed, I  
10 mean, we voted on, I would say yes, but this was  
11 not a topic for public hearings, no.

12 Q. Was the hearing at which you adopted  
13 them public?

14 A. Yeah.

15 Q. Okay. I think we covered it before,  
16 but I just want to ask it again. Did you consider  
17 these guidelines binding on the process?

18 A. All considerations to be adhered to.

19 Q. Okay. So when you say to be adhered  
20 to, you did not feel like you could violate a  
21 guideline if you felt like it?

22 A. They were all to be considered.

23 Q. Okay. But if a map that the staff  
24 proposed violated a guideline, would that be  
25 grounds to not pass that now?